

13 September 1980

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE COMMISSIONERS AHEARNE, GILINSKY, HENDRIE AND BRADFORD

In the Matter of  
PUERTO RICO ELECTRIC POWER  
AUTHORITY (POWER COMPANY)  
Applicant

TOMAS MORALES, PRO SE, ET AL.  
Intervenors  
\*\*\*\*\*

\*  
\*  
\*  
\*  
\*  
\*  
\*

DOCKET NO. 50-376

Proposed North Coast  
Nuclear Plant (Unit 1)  
Islote Ward, Arecibo, P.R.



MOTION

TO THE HONORABLE COMMISSIONERS:

° COMES NOW the undersigned Intervenor, Pro Se, and in representation of Members of Citizens for the Conservation of Natural Resources, Inc. (CCNR), and respectfully states alleges and prays:

° 1. On September 8, 1980 Gonzalo Fernós, Chairman of CCNR, was intervened chirurgically in Baltimore, Maryland (See motion of Replacement of September 3, 1980).

° 2. On September 10, 1980 CCNR received an order served on September 5 from NRC Commissioners J.F.Ahearne, V.Gilinsky, J.M.Hendrie and P.A.Bradford stating that "the time within which the Commission may act to review ALAB - 605 is extended until September 19, 1980".

° 3. Since Intervenors should be given the opportunity to present their case to the Licensing Board before the Commissioners acts to review ALAB - 605 in order not to impare the due process.

DSO3  
S  
1/0

8009180564

G

13 September 1980

° Since the presence of Gonzalo Fernós, now in a hospital in Baltimore, is indispensable for CCNR present their case to the Licensing Board before the Commission acts to review ALAB - 605.

° IN CONSEQUENCE, the Intervenors respectfully ask the Commissioners not to take action until Gonzalo Fernós is back to Puerto Rico from Baltimore and in conditions of presenting CCNR case as stated above.

° In San Juan, Puerto Rico, this 13th day of September, 1980.



*Tomás Morales Cardona*

Tomás Morales Cardona, Ph.D.  
School of Medicine UPR  
GPO Box 5067  
San Juan, Puerto Rico 00936

#### CERTIFICATE OF SERVICE BY MAIL

° I HEREBY CERTIFY: That on this same date original and 2 copies of the above MOTION have been filed by U.S. Air Mail with the Nuclear Regulatory Commission, Docketing and Service Section; one copy served by Air or First Class Mail on each of the following: John F. Ahearne, Chairman NRC; Victor Gilinsky, Commissioner; Joseph M. Hendrie, Commissioner; Peter A. Bradford, Commissioner; Alan S. Rosenthal, Esq., Chairman, ASLAB; Dr. John H. Buck, Member, ASLAB; Michael C. Farrar, Esq., Member, ASLAB; Sheldon J. Wolfe, Esq., Chairman, ASLB; Dr. Richard F. Cole, Member, ASLB; Mr. Gustave A. Linenberger, Member, ASLB; Edwin J. Reis, Esq., Counsel for NRC Staff (All the above bearing same address as follows: United States Nuclear Regulatory Commission, Washington, D.C. 20555); Maurice Axelrad, Esq., Lowenstein, Newman, Axelrad & Toll, 1025 Connecticut Avenue, N.W., Washington, D.C. 20036; José F. Irizarry, Esq., Legal Counsel for Applicant, Puerto Rico Electric Power Authority, GPO Box 4267, San Juan, Puerto Rico 00936; Eng. Alberto Bruno Vega, Executive Director, Puerto Rico Electric Power Authority, GPO Box 4267, San Juan, Puerto Rico 00936.

*Tomás Morales Cardona*

Tomás Morales Cardona, Ph.D.